

**IN THE CIRCUIT COURT OF TENNESSEE  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

JERROD BISHOP, INDIVIDUALLY,  
AND ON BEHALF  
OF ALL THE WRONGFUL DEATH  
BENEFICIARIES OF JARED AUSTIN  
BISHOP, DECEASED

Plaintiffs,

v.

AVR EXPRESS, LLC  
ABDIHAKIM YUSUF OMAR,  
AND JOHN DOES 1-10

Defendants.

Case No. \_\_\_\_\_

JURY DEMANDED

**COMPLAINT**

**COMES NOW**, Jerrod Bishop, individually, and on behalf of all wrongful death beneficiaries of Jared Austin Bishop, and by and through counsel herein, and files this his Complaint against AVR EXPRESS, LLC, AND ABDIHAKIM YUSUF OMAR, and John Does 1-10, and in support thereof, Plaintiffs would show unto the Court as follows:

**PARTIES**

1. Plaintiff, Jerrod Bishop, is an adult resident citizen of Desoto County, Mississippi, who resides at 5662 Caroline Drive, Horn Lake, Mississippi, and is a legal heir at law, and father of the deceased, Jared Austin Bishop, deceased. It is the intent of the Plaintiff herein to pursue a claim for wrongful death on behalf of any and all wrongful death beneficiaries and/or heirs of the

deceased, pursuant to Tenn. Code § 20-5-106, the Wrongful Death Statute of the State of Tennessee, and any other applicable statutes or laws.

2. The Defendant, AVR Express, LLC is a corporation, qualified under the Constitution and laws of the State of Illinois, who may be served with process of this Court through its registered agent and manager, VLADAN STOJANOVIC, 14137 Sterling Drive, Orland Park, IL 60467, or by delivering a copy of the summons and of the complaint to an officer or managing or general agent of AVR EXPRESS, LLC.

3. The Defendant, Abdihakim Yusuf Omar is an adult resident citizen of Colorado, subject to the jurisdiction of this Court, and may be personally served, or served via U.S. Mail, return receipt requested, with process of this Court at his home address of 2390 S Quebec Street, Apt. 205, Denver, CO 80231-6721.

4. Defendants John Does 1-10 are persons, companies, and/or other entities reasonably believed to have acted, or failed to act, and caused the complained-of damages to Plaintiffs. Their identities are not currently known, but when they become known, they will be properly substituted.

### **JURISDICTION AND VENUE**

5. All events which form the basis of this Complaint for Damages are based in tort and occurred in Memphis, Shelby County, Tennessee.

6. Venue is properly situated in Shelby County pursuant to Tenn. Code Ann. § 29-20-308.

7. This Court has exclusive jurisdiction pursuant to Tenn. Code Ann. § 29-20-307.

### **FACTUAL BACKGROUND**

8. On or about October 8, 2021, in Shelby County, Memphis, Tennessee, at 0855 a.m., Jared Austin Bishop was operating his 2015 Dodge Challenger westbound on Shelby Drive when the 2016 Freightliner TT being operated by Abdihakim Yusuf Omar, who made a sudden and illegal U-turn to go eastbound on Shelby Drive, and near Swinnea, blocking both westbound lanes of most of the eastbound lanes on Shelby Drive, when Jared Austin Bishop, who was driving his 2015 Dodge Challenger, blue in color, struck the center of the trailer that the Defendant was carrying, causing his FATAL injuries.

9. The death of Jared Austin Bishop is the result of the negligent operation of the motor vehicle driven by Defendant Driver, Abdihakim Yusuf Omar.

Defendant Abdihakim Yusuf Omar negligently operated his 18-wheeler by doing an illegal u-turn, causing the 2015 Dodge Challenger being driven by the driver and now deceased, Jared Austin Bishop, to collide into his trailer. The driver was cited for his illegal and improper U-turn. Additionally, Plaintiff alleges that the Defendant AVR Express, LLC, negligently hired, trained, supervised, and/or retained the Defendant Driver, and as a driver for AVR Express, LLC and as an agent, joint venture, and/or should be held liable under the principle of “respondent superior”.

10. At the time of the complained of herein between the named Jared Austin Bishop (deceased) and Defendants, said accident occurred without fault or negligence of Jared Austin Bishop, deceased.

11. As a result, Jared Austin Bishop was killed instantly. In addition to the above mentioned acts of negligence, the accident was caused by one or more of the following acts of negligence on the part of the Defendants, for which negligence must stand responsible together, jointly and severally, and said negligence including, but not limited to the following acts and omissions:

- a. Failure to yield the right of way;
- b. Failure to keep a proper look out for other traffic or persons;
- c. Failure to maintain a proper degree of control of the vehicle;
- d. Operating the vehicle in an unsafe, unreasonable, reckless, and or indiscriminate manner without due regard for the safety of others, including Plaintiffs';
- e. Failure to avoid collision;
- f. Negligent entrustment of a motor vehicle;
- g. Following improperly;
- h. Failure to maintain a safe lookout;
- i. Any and all other negligent acts and/or omissions which may be shown during the course of these proceedings.

**COUNT ONE: COMMON LAW ACTS OF NEGLIGENCE**

12. Plaintiff realleges, restates and incorporates all allegations and averments otherwise set forth in Paragraph Nos. 1 through 11 herein.

13. Defendants were negligent in that Abdihakim Yusuf Omar failed to maintain the 2016 Freightliner TT he was operating under due and reasonable control.

14. Defendants were negligent in that Abdihakim Yusuf Omar failed to maintain a due and proper look out in the direction he was traveling.

15. Defendants were negligent in that Abdihakim Yusuf Omar was operating his vehicle at a and made an illegal U-turn on Shelby Drive, causing Plaintiff to collide into the trailer he was hauling, causing Jared Austin Bishop's death.



**COUNT TWO: RESPONDEAT SUPERIOR**

16. Plaintiff realleges, restates and incorporates all allegations and averments otherwise set forth in Paragraph Nos. 1 through 15 herein.

17. Further, AVR Express, LLC, and Abdihakim Yusuf Omar are jointly and severally liable for the injuries negligently caused by Abdihakim Yusuf Omar, driver for AVR Express, LLC.

**COUNT THREE: NEGLIGENCE HIRING, SUPERVISION AND RETENTION**

18. Plaintiff realleges, restates and incorporates all allegations and averments otherwise set forth in Paragraph Nos. 1 through 17 herein.

19. Defendant AVR Express, LLC is negligent in hiring Abdihakim Yusuf Omar to operate one of its truck and trailers, was required to exercise a duty of care commensurate with the nature and hazards of its business as an interstate trucking operator. Defendant AVR Express, LLC, owed a further duty to investigate the reputation of any employee prior to hiring them or otherwise providing them with employment.

20. Defendant AVR Express, LLC is further liable for negligently failing to supervise and train Abdihakim Yusuf Omar.

21. As a proximate and foreseeable result of the negligent hiring, retention and supervision of Abdihakim Yusuf Omar by AVR Express, LLC, set forth above, Jared Austin Bishop is deceased, as a result of the accident on October 8, 2021, as a result of the accident on Shelby Drive, in Memphis, Tennessee.

**COUNT FOUR: WRONGFUL DEATH**

22. Plaintiff realleges restates, and incorporates all allegations and averments otherwise set forth in Paragraph Nos. 1 through 21 herein.

23. As a direct and proximate result of the aforementioned negligence of the Defendants' negligence, Jared Austin Bishop sustained serious bodily injuries, resulting in his death. Defendants are jointly and severally liable unto the heirs and wrongful death beneficiaries of Jared Austin Bishop, for loss of his companionship, society, support, affection and love. The only know heir is (believed to be the sole heir) is Jerrod Bishop, the Plaintiff and father of Jared Austin Bishop, deceased.

24. That as a direct and proximate result of the aforementioned negligent acts of the Defendants, the sole wrongful death beneficiary of Jared Austin Bishop has suffered the untimely and unexpected loss of his son, and has endured severe mental anguish and emotional suffering and has been unduly deprived of the companionship, support, love and affection and has been forced to deal with the horrific and traumatic experience, which has affected his daily life and routine and diminished his enjoyment of life.

25. That Jerrod Bishop, as the sole heir and wrongful death beneficiary of Jared Austin Bishop, seeks and demands any and all damages to which he is entitled by law or equity including, but not limited to, loss of love, society, companionship, loss of affection, pain and suffering and mental anguish, medical expenses, funeral expenses, loss of wage-earning capacity, loss of future wages, loss of ability to enjoy life, economic damages, non-economic damages along with those provided pursuant to Tenn. Code § 20-5-106, the Wrongful Death Statute of the State of Tennessee, and any other applicable statutes or laws.

**COUNT FIVE: GROSS NEGLIGENCE AND PUNITIVE DAMAGES**

26. Plaintiff realleges, restates and incorporates all allegations and averments otherwise set forth in Paragraph Nos. 1 through 25 herein.

27. Defendants' conduct and/or omissions constitute a willful and intentional wrong to Jared Austin Bishop, Deceased, which was done with such gross and reckless negligence as is equivalent to such a wrong, and which entitles Plaintiffs to punitive damages in an amount to be proven at trial.

28. The intentional, willful, unlawful, wanton, reckless, grossly negligent and/or negligent acts and/or omissions of Defendants were proximate causes of the above-described incident, the resulting fatal injuries sustained by Jared Austin Bishop, and resulting losses and damages sustained by Plaintiff.

WHEREFORE PREMISES CONSIDERED, Plaintiff, Jerrod Bishop, in his own right and as father of Jared Austin Bishop, on behalf of all wrongful death beneficiaries of Jared Austin Bishop, Deceased pray that this Court issue the following relief:

- (A) Judgment for damages within the jurisdictional limits of this Court in order to compensate the Plaintiff for the wrongful death of Jared Austin Bishop, Deceased; the cost of medical treatment, inconvenience, pain and suffering in this case, suffered as a result of the allegations contained in this Complaint;
- (B) Judgment for damages in an amount yet to be determined for the economic and non-economic damages provided pursuant to Tenn. Code § 20-5-106, the Wrongful Death Statute of the State of Tennessee, and any other applicable statutes or laws;
- (C) Punitive damages as a result of the allegations contained in this Complaint;
- (D) Pre-judgment and post-judgment interest;
- (E) Plaintiff, Jerrod Bishop, in his own right, and as father of Jared Austin Bishop, on behalf of all wrongful death beneficiaries of Jared Austin Bishop, Deceased, prays for such other relief, both general and specific, as this Court deems appropriate in the premises; and
- (F) Pursuant to Tenn. R. Civ. P. 38 the Plaintiff, Jerrod Bishop, in his own right and as father of Jared Austin Bishop, on behalf of all wrongful death beneficiaries of Jared Austin Bishop, Deceased demand a trial by jury on all claims as to which they have a right to trial by jury.
- (G) Judgment for damages within the jurisdictional limits of this Court in order to compensate the Plaintiffs for the wrongful death of Jared Austin Bishop, Deceased;



the cost of medical treatment, inconvenience, pain and suffering in this case, suffered as a result of the allegations contained in this Complaint;

- H. Judgment for damages in an amount yet to be determined for the economic and non-economic damages provided pursuant to Tenn. Code § 20-5-106, the Wrongful Death Statute of the State of Tennessee, and any other applicable statutes or laws;
- I. Punitive damages as a result of the allegations contained in this Complaint;
- J. Pre-judgment and post-judgment interest and attorneys fees.

THIS the 28<sup>th</sup> day of February 2022.

Respectfully submitted,



Frank L. Watson, III (Tenn. Bar No. 15073)

William F. Burns (Tenn. Bar No. 17908)

William E. Routt (Tenn. Bar No. 28577)

WATSON BURNS, PLLC

253 Adams Avenue

Memphis, Tennessee 38103

Phone: (901) 529-7996

Fax: (901) 529-7998

*Counsel for Plaintiffs*

OF COUNSEL:

Marc Boutwell, MSB#9263

Charles Edwards, MSB#99773

Law Office of Marc Boutwell, PLLC

103 West China Street

PO Box 956

Lexington, MS 39095-0956

Telephone: 662-834-9029

Telecopier: 662-834-3117

*Counsel for Plaintiffs*



(CIRCUIT/CHANCERY) COURT OF TENNESSEE  
140 ADAMS AVENUE, MEMPHIS, TENNESSEE 38103  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHISELECTRONICALLY FILED  
2022 Feb 28 11:38 AM  
CLERK OF COURT

## SUMMONS IN CIVIL ACTION

☒ Lawsuit  
☐ Divorce

Docket No. \_\_\_\_\_

Ad Damnum \$ \_\_\_\_\_

JERROD BISHOP, INDIVIDUALLY, AND  
ON BEHALF  
OF ALL THE WRONGFUL DEATH  
BENEFICIARIES  
OF JARED AUSTIN BISHOP, DECEASED

VS

AVR EXPRESS, LLC,  
ABDIHAKIM YUSUF OMAR,  
AND JOHN DOES 1-10

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

ABDIHAKIM YUSUF OMAR  
2390 S QUEBEC STREET  
APT. 205  
DENVER, CO 80231-6721

Method of Service:

- ☐
- Certified Mail
- 
- ☐
- Shelby County Sheriff
- 
- ☐
- Commissioner of Insurance (\$)
- 
- ☐
- Secretary of State (\$)
- 
- ☐
- Other TN County Sheriff (\$)
- 
- ☒
- Private Process Server
- 
- ☐
- Other

(\$ Attach Required Fees)

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Frank L. Watson, III

Plaintiff's

attorney, whose address is Watson Burns, PLLC, 253 Adams Ave, Memphis, TN 38103

telephone (901) 529-7996

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED \_\_\_\_\_ By \_\_\_\_\_, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20\_\_

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: \_\_\_\_\_, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons  
and a copy of the Complaint to the following Defendant \_\_\_\_\_  
at \_\_\_\_\_

\_\_\_\_\_  
Signature of person accepting service

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant \_\_\_\_\_  
because \_\_\_\_\_ is (are) not to be found in this County after diligent search and inquiry for the following  
reason(s): \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process



**The Shelby County, Tennessee Circuit Court**

**Case Style:** JERROD BISHO VS AVR EXPRESS LLC

**Case Number:** CT-0770-22

**Type:** SUMMONS ISSD TO MISC

A handwritten signature in dark ink, appearing to be "DS", is written over a light gray rectangular background.

David Smith, DC

Electronically signed on 03/01/2022 10:53:07 AM



**SUMMONS IN CIVIL ACTION**

☒ Lawsuit  
☐ Divorce

Docket No. \_\_\_\_\_

Ad Damnum \$ \_\_\_\_\_

JERROD BISHOP, INDIVIDUALLY, AND  
ON BEHALF  
OF ALL THE WRONGFUL DEATH  
BENEFICIARIES  
OF JARED AUSTIN BISHOP, DECEASED

VS

AVR EXPRESS, LLC,  
ABDIHAKIM YUSUF OMAR,  
AND JOHN DOES 1-10

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

AVR EXPRESS, LLC  
C/O ITS REGISTERED AGENT  
VLADAN STOJANOVIC  
14137 STERLING DRIVE  
ORLAND PARK, IL 60467

Method of Service:

☐ Certified Mail  
☐ Shelby County Sheriff  
☐ Commissioner of Insurance (\$)  
☐ Secretary of State (\$)  
☐ Other TN County Sheriff (\$)  
☒ Private Process Server  
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Frank L. Watson, III

Plaintiff's

attorney, whose address is Watson Burns, PLLC, 253 Adams Ave, Memphis, TN 38103

telephone (901) 529-7996

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED \_\_\_\_\_ By \_\_\_\_\_, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

\_\_\_\_\_ 20\_\_

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: \_\_\_\_\_, D.C.

RETURN OF SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE** SERVED THE WITHIN SUMMONS:

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ M. a copy of the summons  
and a copy of the Complaint to the following Defendant \_\_\_\_\_  
at \_\_\_\_\_

\_\_\_\_\_  
Signature of person accepting service

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process

RETURN OF NON-SERVICE OF SUMMONS

I HEREBY CERTIFY THAT I **HAVE NOT** SERVED THE WITHIN SUMMONS:

To the named Defendant \_\_\_\_\_  
because \_\_\_\_\_ is (are) not to be found in this County after diligent search and inquiry for the following  
reason(s): \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

By: \_\_\_\_\_  
Sheriff or other authorized person to serve process



**The Shelby County, Tennessee Circuit Court**

**Case Style:** JERROD BISHO VS AVR EXPRESS LLC

**Case Number:** CT-0770-22

**Type:** SUMMONS ISSD TO MISC

A handwritten signature in dark ink, appearing to be "DS", is written over a light blue rectangular background.

David Smith, DC

Electronically signed on 03/01/2022 10:53:07 AM



**SUMMONS IN CIVIL ACTION**

☒ Lawsuit  
☐ Divorce

Docket No. \_\_\_\_\_

Ad Damnum \$ \_\_\_\_\_

JERROD BISHOP, INDIVIDUALLY, AND  
ON BEHALF  
OF ALL THE WRONGFUL DEATH  
BENEFICIARIES  
OF JARED AUSTIN BISHOP, DECEASED

VS

AVR EXPRESS, LLC,  
ABDIHAKIM YUSUF OMAR,  
AND JOHN DOES 1-10

Plaintiff(s)

Defendant(s)

TO: (Name and Address of Defendant (One defendant per summons))

AVR EXPRESS, LLC  
C/O ITS REGISTERED AGENT  
VLADAN STOJANOVIC  
14137 STERLING DRIVE  
ORLAND PARK, IL 60467

Method of Service:

- ☐ Certified Mail  
☐ Shelby County Sheriff  
☐ Commissioner of Insurance (\$)  
☐ Secretary of State (\$)  
☐ Other TN County Sheriff (\$)  
☒ Private Process Server  
☐ Other

(\$ Attach Required Fees

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and

serving a copy of your answer to the Complaint on Frank L. Watson, III

Plaintiff's

attorney, whose address is Watson Burns, PLLC, 253 Adams Ave, Memphis, TN 38103

telephone (901) 529-7996

within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Complaint.

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master

TESTED AND ISSUED \_\_\_\_\_ By \_\_\_\_\_, D.C.

TO THE DEFENDANT:

NOTICE; Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice:

Tennessee law provides a ten thousand dollar (\$10,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed. These include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

FOR AMERICANS WITH DISABILITIES ACT (ADA) ASSISTANCE ONLY, CALL (901) 222-2341

I, TEMIKA D. GIPSON / W. AARON HALL, Clerk of the Court, Shelby County, Tennessee, certify this to be a true and accurate copy as filed this

20\_\_

TEMIKA D. GIPSON, Clerk / W. AARON HALL, Clerk and Master By: \_\_\_\_\_, D.C.

RETURN OF SERVICE OF SUMMONSI HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:

By delivering on the 2nd day of March, 2022 at 10:05 pm M. a copy of the summons  
 and a copy of the Complaint to the following Defendant Vladan Stojanovic - Registered Agent, AVR Express, LLC.  
 at 14137 Sterling Drive, Orland Park, Illinois 60467

\* REFUSED TO SIGN

Signature of person accepting service

By: Yanni Athiros - Process Server

Sheriff or other authorized person to serve process

\* SUBJECT WAS AFRAID TO OPEN STORM DOOR TO TAKE THE PROCESS, AND  
 ASKED THE PROCESS SERVER TO PLACE THE DOCUMENTS IN THE  
 CRACK AT THE BOTTOM OF THE STORM DOOR. AS PROCESS WALKED  
 AWAY, MR. STOJANOVIC WAS OBSERVED OPENING THE DOOR AND  
 TAKING THE DOCUMENTS.

RETURN OF NON-SERVICE OF SUMMONSI HEREBY CERTIFY THAT I HAVE NOT SERVED THE WITHIN SUMMONS:

To the named Defendant \_\_\_\_\_

because \_\_\_\_\_ is (are) not to be found in this County after diligent search and inquiry for the following

reason(s): \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

By: \_\_\_\_\_  
 Sheriff or other authorized person to serve process

**IN THE CIRCUIT COURT OF TENNESSEE  
FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

---

JERROD BISHOP, INDIVIDUALLY,  
AND ON BEHALF  
OF ALL WRONGFUL DEATH  
BENEFICIARIES OF JARED AUSTIN  
BISHOP, DECEASED

Plaintiffs,

v.

AVR EXPRESS, LLC  
ABDIHAKIM YUSUF OMAR,  
AND JOHN DOES 1-10

Defendants.

---

Docket No.: CT-0770-22  
Division VIII  
JURY DEMANDED

---

**NOTICE OF FILING OF NOTICE OF REMOVAL**

---

Defendants, AVR Express, LLC, (“Defendant”), hereby give notice to the Circuit Court of Shelby County, Tennessee, and to the attorneys of record for the Plaintiffs, that on March 21<sup>st</sup>, 2022, Defendant has filed a Notice of Removal with the United States District Court for the Western District of Tennessee, Western Division, seeking to remove this case to that court. A copy of Defendant’s Notice of Removal is attached hereto as *Exhibit A*.

Dated this \_\_\_\_ day of March, 2022.



Respectfully submitted,

**LEWIS THOMASON, P.C.**

By: s/Stephen W. Vescovo  
Stephen W. Vescovo (7246)  
Patrick S. Quinn (35293)  
40 S. Main Street, Suite 2900  
Memphis, TN 38103  
(901) 525-8721 (telephone)  
(901) 525-6722 (facsimile)  
[svescovo@lewisthomason.com](mailto:svescovo@lewisthomason.com)  
[pquinn@lewisthomason.com](mailto:pquinn@lewisthomason.com)  
*Attorneys for Defendant AVR Express, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and exact copy of the foregoing Notice of Filing of Notice of Removal has been served upon the counsel for the parties in interest herein as set forth below:

<input type="checkbox"/> Hand	Charles Edwards
<input checked="" type="checkbox"/> Mail	Marc Boutwell
<input type="checkbox"/> Fax	LAW OFFICE OF MARC BOUTWELL, PLLC
<input type="checkbox"/> FedEx	103 West China St.
<input type="checkbox"/> EFS	P.O. Box 956
<input checked="" type="checkbox"/> E-mail	Lexington, MS 39095-0956
	<a href="mailto:edwardcc@bellsouth.net">edwardcc@bellsouth.net</a>
	<a href="mailto:boutwell@bellsouth.net">boutwell@bellsouth.net</a>
	<i>Attorneys for Plaintiffs</i>
<input type="checkbox"/> Hand	Frank L. Watson
<input checked="" type="checkbox"/> Mail	William F. Burns
<input type="checkbox"/> Fax	William E. Routt
<input type="checkbox"/> FedEx	WATSON BURNS, PLLC
<input type="checkbox"/> EFS	253 Adams Avenue
<input checked="" type="checkbox"/> E-mail	Memphis, TN 38103
	<a href="mailto:fwatson@watsonburns.com">fwatson@watsonburns.com</a>
	<a href="mailto:bburns@watsonburns.com">bburns@watsonburns.com</a>
	<a href="mailto:wroutt@watsonburns.com">wroutt@watsonburns.com</a>
	<i>Attorneys for Plaintiffs</i>

Dated this 21<sup>st</sup> day of March, 2022.

s/Stephen W. Vescovo  
Stephen W. Vescovo